



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL REVIEW AND
ASSESSMENT

December 5, 2016

Ian Reid, District Ranger
North Fork John Day Ranger District
PO Box 158
Ukiah, Oregon 97880

Dear Mr. Reid:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Ten Cent Wildfire Protection Project on the North Fork John Day and Whitman Ranger Districts within the Umatilla and Wallowa-Whitman National Forests (EPA Project Number 16-0062-AFS). Our review was conducted in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The DEIS analyzes the range of effects of four alternatives: the no action alternative and three action alternatives. The action alternatives are designed to (1) create a series of strategically placed defensible fuel profile zones; (2) enhance landscape resilience to future wildfires; and (3) maintain and enhance local communities and economies by providing a diversity of resource management activities. Project components under Alternative 2 (the preferred alternative) include thinning activities across 13,445 acres, prescribed fire, mechanical fuels treatment, roadside hazard treatments, and provision for private and commercial firewood harvest. In general, Alternative 3 would treat fewer acres with prescribed fire than the proposed alternative, and Alternative 4 would undertake thinning on fewer acres than the other action alternatives.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be robust and well organized. Overall, we find the treatments proposed under Alternative 2 to align well with the broad body of science on dry and moist mixed conifer forests.¹ We also appreciate the decision to limit activity within the Riparian Habitat Conservation Areas. We have reviewed the Project Design Criteria in Chapter 2 and the Best Management Practices referenced in Appendix B and find the proposed project activities are consistent with the 2010 John Day River Basin Total Maximum Daily Load and Water Quality Management Plan.

In our August, 2015 scoping comments, the EPA recommended that the Forest undertake an analysis of greenhouse gas emissions consistent with CEQ guidance.² The DEIS states on page 221 that, "A project of this size would have such minimal contributions of greenhouse gasses that...the proposed action's direct and indirect contribution to greenhouse gasses and climate change would be negligible. Because the direct and indirect effects would be negligible, the proposed action's contribution to cumulative effects on greenhouse gasses and climate change would also be negligible." We recommend that as the EIS is finalized, the Forest Service move away from characterizing project-related emissions as not

¹ http://www.fs.fed.us/pnw/publications/MMC_Synthesis_24Feb14.pdf

² <https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>

being meaningful. Changes in climate are not attributable to any single action, but are exacerbated by a series of smaller decisions.

As the FEIS is finalized, we encourage the Forest Service to include a comparison of net GHG emissions and carbon stock changes that would occur with and without implementation of the Ten Cent Project. This analysis can incorporate by reference earlier programmatic studies or information, such as management plans, inventories, assessments, and research that considers potential changes in carbon stocks, as well as any relevant programmatic NEPA reviews.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this project. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at littleton.christine@epa.gov. Or you may contact Teresa Kubo of my staff at 503-326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is written in a cursive, flowing style.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit

Enclosure:

1. US Environmental Protection Agency Rating System For Draft Environmental Impact Statements